

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

CHRISTINA SMITH, as Personal  
Representative of the Estate of Her Son,  
Joshua Christopher England,

Plaintiff,

– against –

JOE ALLBAUGH, CARL BEAR, ROBERT  
BALOGH, WENDELL MILES, LAURA  
HAYS, LAURA NOBLE, OKLAHOMA  
DEPARTMENT OF CORRECTIONS  
OFFICERS JOHN DOES #1-10, and CASE  
MANAGER RICHARD ROE,

Defendants.

**Case No. 19-cv-00470-G**

**PLAINTIFF’S EXPERT WITNESSES IN CHIEF**

Plaintiff Christina Smith hereby discloses the following expert witnesses in chief pursuant to the Court’s March 31, 2023 Amended Scheduling Order (Dkt. No. 151).

<b>Expert</b>	<b>Testimony</b>
<ul style="list-style-type: none"><li>• Roxie M. Albrecht, MD, FACS, CCM, DABS</li></ul>	General surgery expert
<ul style="list-style-type: none"><li>• David R. Payne, CPA, ASA, ABV, CDBV, CTP, CIRA</li><li>• Sandra J. Bassett, CPA</li></ul>	Lost earnings experts
<ul style="list-style-type: none"><li>• Zachary Rosner, MD</li></ul>	Correctional healthcare expert
<ul style="list-style-type: none"><li>• Kathy Wild, RN, MPA, CCHP-RN</li></ul>	Correctional nursing expert

Dated: April 10, 2023  
New York, New York

**RESPECTFULLY SUBMITTED:**

/s/

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Emily K. Wanger (*admitted pro hac vice*)  
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c. All counsel (via ECF)

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 10th day of April, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants.

/s/ Emily K. Wanger